

SOP#: G-009F

Prepared by: Rachel Oda Carteiro

Approved by: Tim Culliton

Title: *Multi-Year Accessibility Plan*

CULLITON is committed to meeting the needs of its Team Members and customers with disabilities and is working hard to remove and prevent barriers to accessibility. CULLITON is also committed to fulfilling our requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standard (IAS) under Ontario Regulation 191/11. This accessibility plan outlines the steps CULLITON is taking to meet those requirements and to improve opportunities for people with disabilities. Our plan shows how CULLITON will play its role in making Ontario an accessible province for all Ontarians. It will be reviewed and updated at least every 5 years, or as required.

Past Achievements:

1.0 Development of Accessibility Policies and Statement of Commitment

Since 2014, CULLITON has maintained its statement of commitment and accessibility policies. They are available to the public on the CULLITON website and available in accessible formats, upon request. These policies have been revised on an as-needed basis and reflect CULLITON's changing business model. Our compliance with our own policies ensures our compliance with AODA and the IAS.

2.0 Development of Accessibility Plan

Since 2014, CULLITON has been making and following multi-year accessibility plans that help ensure compliance with AODA. This latest reiteration of our plan confirms that integration is an important part of CULLITON organizational operations and procedures. The latest version of the plan is available on the CULLITON website and is available in accessible formats, upon request.

3.0 Team Member Training

Since 2015, all CULLITON Team Members have received AODA training and since 2016, all Team Members have received additional AODA customer service training. New Team Members are given this training as part of their orientation package and proof of completion is kept on our records. We currently use a third-party provider to deliver online, AODA compliant training to Team Members.

4.0 Accessible Feedback Options

Since 2015, CULLITON has offered accessible feedback options upon request. Our feedback procedure is available on the CULLITON website, and more information can be requested, all in accessible formats upon request. CULLITON customer service Team Members will accept feedback from any customer, no matter how or when it is delivered.

5.0 Accessible Recruitment Procedures

Since 2016, CULLITON has been offering and informing all potential candidates and selected individuals that accommodations are available throughout the entire recruitment and hiring process. Requests for accommodation are always taken seriously and addressed immediately. CULLITON's hiring procedure includes fixed notices on job postings, interview offers, and contract letters of offer about available accommodations.

6.0 Team Member Supports and Accommodations

Since 2016, CULLITON has maintained policies and procedures for individualized accommodation plans for Team Members and individual Team Member emergency response plans/information. Team Members are made aware of the option of individual plans upon hire and through the policies we provide all Team Members access to. Our most used accommodation plan is our return-to-work procedure, which complies with both WSIB and AODA standards.

Current Strategies and Actions:

1.0 Redevelopment of CULLITON Facilities

As CULLITON considers renovations and repurposing of some of its facilities, we will keep in mind the Design of Public Space Standard. Specifically:

- Ensuring the appropriate number and type of accessible parking spots are in the public parking area with the proper lines painted.
- Ensuring that all interior public areas remain accessible and add accessible elements, such as a low service counter, if applicable.
- Ensuring all outside paths intended for public use are safe and accessible, including following the technical specifications set out in the IAS.

If CULLITON were to do major renovations or new construction, we would ensure that our contractor will comply with the IAS in its entirety, including training requirements of their Team Members.

2.0 Regular Maintenance to Accessible Elements

To maintain accessible elements on/in CULLITON's public facilities, regular maintenance will be performed, including:

- Using salt, or a similar environmentally friendly de-icing agent, to remove ice from public paths to lobby door.
- Checking the lobby for spills and debris that may cause injury or inaccessibility to a visitor.
- Shoveling snow blocking public paths between accessible parking and the lobby door before opening hours, whenever possible.
- Testing the operation of the automatic doors monthly.

3.0 Temporary Disruptions to Accessible Elements

In case of the temporary disruption of an accessible element, the following will occur:

- In case of lobby door being inaccessible, visitors will be greeted at the side employee door.
- In case of the public area of the CULLITON office being inaccessible, visitors will instead arrange virtual meetings.

If in the future the CULLITON office were to add more accessible elements to public areas, a similar plan would be made and included in the Multi-Year Accessibility Plan.

4.0 Accessibility Training for Contractors

All contract workers assigned to a CULLITON-led project must have completed AODA compliant accessibility training. If the contractor cannot confirm or provide proof of completion for their assigned employees, CULLITON will offer the contractor a link to AODA compliant accessibility training for the contractor to complete in their own time.

President & CEO Signature



Tim Culliton
President & CEO
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